

Dear Chairman Genachowski:

Amid recent reports that, on a typical day, children ages 8 to 18 devote an average of more than 7 hours to using entertainment media (more than 53 hours a week); the American Speech-Language-Hearing Association (ASHA) applauds the Federal Communication Commissions inquiry related to Empowering Parents and Protecting Children in an Evolving Media Landscape.

ASHA is the professional and scientific association representing more than 135,000 speech-language pathologists, audiologists, and speech, language, and hearing scientists.

While we agree that issues related to obesity, Internet safety, and violent imagery must be addressed, we urge the FCC to include in its discussions these additional concerns: the potential risk of noise induced hearing loss from the misuse of personal audio technology, and the potential negative impact of the overuse of entertainment media on communication development, specifically in the areas of talking, listening, reading, and writing.

ASHA has been a national and international leader raising such concerns. For example, in 2006, ASHA conducted a nationwide poll that found that adults and teenagers were listening to their personal audio devices for longer periods of time and at unsafe volumes. In addition, more than half of the high school students polled reported having at least one symptom of hearing loss. Such findings were the impetus for ASHAs Listen to Your Buds public education campaign (www.listentoyourbuds.org), which aims to teach children how to use personal audio technology properly so that they protect their hearing. In this vital effort, ASHA is partnered with organizations such as the National Institute on Deafness and Other Communication Disorders, the Consumer Electronics Association, and Parents Choice Foundation.

Meanwhile, there is mounting evidence that there is reason to be concerned. In 2009, leading authorities predicted a rise in hearing loss nationally due to unsafe use of personal audio devices. Last month, a Kaiser Family Foundation study showed that ownership of personal audio devices such as iPods and MP3 players among children has increased from 18 to 76 percent in just the past 5 years. Additionally, an October 2008 study conducted by the European Unions (EU) Scientific Committee found that listening to personal audio devices with headphones at volumes greater than 89 decibels could have detrimental effects on hearing. As a result of these findings, effective this year, the EU requires that all personal music players and smart phones be manufactured with a lower default volume of 80 decibels.

I want to underscore that the consequences of a hearing loss can be devastating, especially for a child. In fact, studies show that even a mild hearing loss due to excessive noise can lead to delays in speech and language development, affecting a students ability to pay attention in the classroom.

Exposure to loud noise has also been linked with numerous physiological changes, sleep difficulties, digestive problems, delayed emotional development, stress related disorders, behavioral problems, body fatigue, and possible immunological effects. Moreover, besides ASHA and its Buds campaign partners, others like the National Association of School Nurses contend that hearing loss affects communication and has a negative impact on the social, emotional, and educational development and well-being of students.

Besides these areas, ASHA is concerned about the impact of the overuse of entertainment media on communication development.

For younger children, a key part of language learning involves interacting with adults and other children. When parents and caregivers interact with their young children, they talk in a way that enhances their child's language development. Their language is tailored to their child's specific language learning needs. They adjust it depending on whether a child needs shorter or longer sentences, more varied vocabulary, or helpful gestures. Parents can raise the pitch of their voice and modify what they say to gain a child's attention. This says this talk is just for you.

But sound language development is not just a matter of quality; it is also one of quantity. Children need opportunities to use social language skills to become good at conversations. In fact, researchers have found that the more parents talk to their child, the larger the child's vocabulary. Also, children whose parents talk to them a lot have better academic skills when they get older. The most important aspect of parent talk is its amount.

Electronic media can be helpful if it is used in a way that fosters language interaction with adults and peers. However, most of the time, electronic media limits language and social interaction and fosters social isolation.

Consequently, ASHA is concerned that overuse of entertainment media reduces opportunities for language interactions and reading and writing. Children need practice using words and interacting with adults and peers. Thus, if they spend excessive amounts of time with such media, it may adversely affect language development because these children are not receiving the language models and play interactions upon which further language acquisition is built. Time spent in front of the computer screen or using other forms of entertainment media decreases the amount of time that parents have to talk to their children and that could lead to language delay. It also takes away from experiences that are more beneficial to language development such as having conversations, reading books together, and interacting with peers.

Additionally, all of the flash and quickly changing images on a computer or television screen can distract children with language learning problems. Finally, the messages from computers are the

same for all children, regardless of their language levels.

For older children, the overuse of electronic media such as sending text messages rather than talking to peers, can reduce or negatively affect the quality of written expression. By design, text messages are short, truncated, repetitive, and abbreviated, the antithesis of grammatically correct, creative, vocabulary-rich written language forms of expression. Overreliance on text messaging can impede a students ability to read books and write papers that require understanding and the use of long, complex sentences with a variety of words.

ASHA will continue its public education efforts regarding its concerns about the communication health of our children. We believe, however, that in order to elevate their priority, the FCC should include them as areas of importance to empower parents and protect children in an evolving media landscape. Public and private parties need to work together to address the adverse effect that the misuse of entertainment media can have on a childs health and communication skills. It is imperative the FCC raise these concerns in its public education efforts.

Thank you again for your attention to entertainment media and its impact on children. If you have any questions or would like additional information on ASHAs efforts, please do not hesitate to contact me.

Sincerely,

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President
American Speech-Language-Hearing Association